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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
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14 UNITED STATES OF AMERICA,)	CASE NO. 3:17-MJ-70631-MAG
15 Plaintiff,)	
16 v.)	UNITED STATES' NOTICE OF MOTION AND
17 BRYAN PETERSEN,)	ADMINISTRATIVE MOTION TO FILE
18 Defendant.)	EXHIBITS UNDER SEAL
19 _____)	

20 **NOTICE OF MOTION**

21 Pursuant to Criminal Local Rule 56-1, the Government hereby moves the Court for an Order
22 permitting it to file under seal Exhibits C through E to the Declaration of Julie Garcia in Support of the
23 United States' Motion to Revoke Release Order and to Order Bryan Petersen Detained. This motion is
24 based upon this Notice of Motion, the attached Memorandum of Points and Authorities, the files and
25 records in this case, and any other evidence or argument that may properly be presented to the Court.

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28 UNITED STATES' ADMINISTRATIVE MOTION TO FILE EXHIBITS UNDER SEAL

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Exhibit C to the Declaration of Julie Garcia in Support of the United States' Motion to Revoke
3 Release Order and to Order Bryan Petersen Detained is a CD containing an audio recording of an
4 interview with Defendant Bryan Petersen, which includes references to the minor victims in this case
5 and to targets of ongoing investigations that are not public.

6 Exhibit D to the Garcia Declaration is a true and accurate copy of excerpts of Kik messages
7 exchanged between Petersen and Defendant Ryan Michael Spencer, which include images of the minor
8 victims in this case. The images of child pornography have been blurred, and the children's names have
9 been redacted.

10 Exhibit E to the Garcia Declaration is a true and accurate copy of a compendium of victim
11 impact statements submitted by parents of some of the minor victims. These statements include highly
12 sensitive personal information relating to the victims.

13 Each of these Exhibits contains highly sensitive information regarding some of the minor victims
14 in this case, including personally identifiable information and information that, taken together, could be
15 used to identify the victims. Under the Crime Victims' Rights Act, a victim of a crime has "the right to
16 be treated with fairness and with respect for the victim's dignity and privacy." *See* 18 U.S.C.
17 § 3771(a)(8). In addition, each of these exhibits contains information relevant to ongoing criminal
18 investigations that would be compromised by public disclosure.

19 Therefore, the Government respectfully requests that the Court permit it to file these Exhibits
20 under seal.

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22 DATED: May 4, 2017

Respectfully submitted,
BRIAN J. STRETCH
United States Attorney

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25 /s/
JULIE D. GARCIA
26 Assistant United States Attorney
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